

App. No. 09/784,246  
Amendment Dated July 5, 2005  
Reply to Final Office Action of June 17, 2005

### REMARKS/ARGUMENTS

Claims 1-47 remain in this application for further consideration in light of the foregoing remarks. Claims 1-2, 11-12, 21, 31-32, 36-37, 41, 44, and 47 are currently amended, and claims 3-10, 13-20, 22-30, 33-35, 38-40, 42-43, and 45-46 are original. No new matter has been added.

#### **I. Rejection of Claims 1-47 Under 35 U.S.C. §103(a).**

Claims 1, 4, 8-11, 14, 18-21, 23, 27-31, 34, 38-40, and 47 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,907,326 issued to Atkin et al. ("Atkin"), in view of U.S. Patent No. 5,596,698 issued to Morgan ("Morgan"), and further in view of U.S. Patent No. 5,442,782 issued to Malatesta et al. ("Malatesta"). Claims 2-3, 5-7, 12-13, 15-17, 22, 24-26, 32-33, and 35-37 are rejected under 35 U.S.C. §103(a) as being unpatentable over Atkin in view of Morgan and further in view of Malatesta as applied to claims 1, 11, 21, and 31 above, and further in view of U.S. Patent No. 5,835,912 issued to Pet ("Pet"). Applicant respectfully disagrees with the rejections for the reasons set forth below.

#### **1. All the Claim Limitations are Not Taught or Suggested.**

Even if, for argument sake, the above references could be combined in the manner suggested, the above references fail to teach all the limitations of the claims as amended. Moreover, any assertion otherwise fails to consider the prior art and the present invention *as a whole*. Even though applicant believes the claims are allowable as written, the claims have been amended as set forth above to clarify the invention. Applicant's independent claim 1 specifically recites the following elements that are not taught or suggested by any of the cited references:

"providing a *non-localized data store* including non-localized language-dependent data associated with a first language"

App. No. 09/784,246  
Amendment Dated July 5, 2005  
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**"providing a localized data store including localized language-dependent information associated with the first language and a geographic location, wherein the geographically localized language-dependent information is updatable upon a change associated with the geographic location"**

Applicant's independent claim 11 specifically recites the following elements that are not taught or suggested by any of the cited references:

**"providing a non-localized data store including non-localized language-dependent data associated with a first language"**

**"providing a localized data store including localized language-dependent information associated with the first language and a geographic location, wherein the geographically localized language-dependent information is updatable upon a change associated with the geographic location"**

Applicant's independent claim 21 specifically recites the following elements that are not taught or suggested by any of the cited references:

**"localized data store means for containing localized language-dependent information for a plurality of languages and at least one geographic location, wherein the localized language-dependent information is updateable upon a change associated with the geographic location"**

Applicant's independent claim 31 specifically recites the following elements that are not taught or suggested by any of the cited references:

**"a non-localized data store configured to contain non-localized language-dependent information associated with a first language"**

**"a localized data store configured to contain localized language-dependent information for a plurality of languages and a registry, wherein the localized language-dependent information is associated with a geographical location and updateable upon a change associated with the geographical location"**

Applicant's independent claim 44 specifically recites the following elements that are not taught or suggested by any of the cited references:

**"a registry configured to contain localized language-dependent information for a plurality of languages and at least one geographical location, wherein the**

App. No. 09/784,246  
Amendment Dated July 5, 2005  
Reply to Final Office Action of June 17, 2005

***localized language-dependent information is updateable upon a change associated with the geographic location"***

Applicant's independent claim 47 specifically recites the following elements that are not taught or suggested by any of the cited references:

***"a filename data store configured to contain localized filenames in a plurality of languages, wherein the localized filenames are associated with at least one geographic location and are dynamically updateable upon a change associated with the geographic location"***

The cited references do not teach or otherwise suggest all of the limitations that are recited in applicant's independent claims 1, 11, 21, 31, 41, 44 and 47. Accordingly, claims 1, 11, 21, 31, 41, 44 and 47 are clearly allowable under 35 U.S.C. §103(a).

Regarding claims 2-10, 12-20, 22-30, 32-43, and 45-46 of the present invention, applicant asserts that the limitations of those claims are not taught or otherwise suggest by the cited art. Moreover, claims 1-10, 12-20, 22-30, 32-43, and 45-46 ultimately depend from independent claims 1, 11, 21, 31, 41, 44 and 47, respectively. Claims 1, 11, 21, 31, 41, 44 and 47 are thought allowable for the reasons set forth above. Therefore, applicant asserts that claims 2-10, 12-20, 22-30, 32-43, and 45-46 are allowable for at least those same reasons.

**2. No Suggestion or Motivation to Modify the References.**

Applicant maintains that there is no suggestion or motivation in any of the references that they may be modified in the manner suggested. Atkin pertains to a system and method for changing the cultural profile of different aspects of a windows system. (See Atkin at col. 4, lines 5-26). Atkin teaches, "the interaction portion of a program, such as toolbars and menus, may use a different cultural profile than the cultural profile used by the data portion of a program." (Atkin at col. 4, lines 11-14). Atkin also teaches a drag-and-drop interface for changing cultural

App. No. 09/784,246  
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profiles on a windows system. (See Atkin at col. 4, lines 19-26). Succinctly stated, Atkin teaches a software system that allows a user to change the cultural layout of an application. (See Atkin at col. 4, lines 5-26). For example, a user may desire the controls of a word processing application to be in French but the typing input to be in English. (See generally Atkin at col. 4, lines 5-26).

Morgan does not even remotely relate to a system and method for changing the cultural aspects of a windows application as taught in Atkin. Morgan teaches an apparatus for recognizing handwriting and interacting with a student. (See Morgan at col. 3, lines 28-37). Morgan teaches that the apparatus may include a notebook type computer and that the notebook can process handwriting to teach math, science, English and the like. (See Morgan at col. 4, lines 1-65). In passing, Morgan states that "[l]ocalization is possible within the scripting language, so that the TeachPad computer 10 invention can be easily adapted for any language." (Morgan at col. 4, lines 14-16). Here, Morgan is merely teaching that the software may be adapted for any language. Morgan does not teach a system and method for *changing the cultural aspects of a single program*. In fact, Morgan teaches directly away from such an invention. As opposed to teaching a system and method that may be switched between many cultures, Morgan teaches, "separate lessons for each language and culture." (Morgan at col. 14, lines 14-15). Stated another way, each culture must have a different "Teachpad" or accompanying software. (See generally Morgan at col. 14, lines 14-15). This teaching is directly contrary to Morgan. Accordingly, a person of ordinary skill in the art presented with problems associated with making windows applications multicultural as exhibited by Atkin, would hardly be disposed on any objective basis to consider a reference such as Morgan.

App. No. 09/784,246  
Amendment Dated July 5, 2005  
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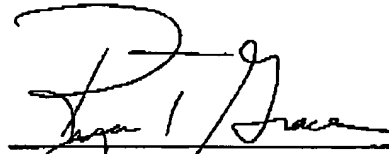
Moreover, a person of ordinary skill in the art would not consider the Malatesta invention or the Pet invention. Malatesta pertains to a database application for creating and maintaining related international records. (See Malatesta at col. 2, lines 6-12). Malatesta teaches that data items can be stored in a base language with accompanying related copies of the data items represented in multiple languages. (See Malatesta at col. 2, lines 23-32). Conversely, Atkin is entirely unconcerned with storing, creating or maintaining multiple documents with different language bases. Regarding the Pet invention, Pet pertains to a database that is accessible to many cultures or countries. (See generally Pet at col. 1, line 12-col. 4, line 33). Pet teaches storing, retrieving and modifying data in a database in multiple languages, concurrently. (See generally Pet at col. 1, line 12-col. 4, line 33). Stated another way, a document may have several forms (e.g. English, German and French). (See generally Pet at col. 1, line 12-col. 4, line 33). A French user may alter a document and the alteration will be evident to an English user viewing the document in English. (See generally Pet at col. 1, line 12-col. 4, line 33). Atkin is entirely unconcerned with such teaching. Therefore, a person of ordinary skill in the art, concerned with the problems addressed in Atkin, would not consider any of the aforementioned references. Accordingly, for the above reasons, applicant believes the claims are allowable under 35 U.S.C. §103(a).

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

App. No. 09/784,246  
Amendment Dated July 5, 2005  
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Respectfully submitted,

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